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December 31, 2001

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Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
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Washington, DC 20554

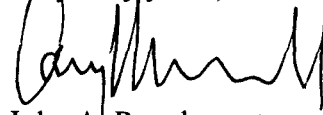
***Re: CC Docket No. 94-102 / Fourth Quarterly TTY Implementation Report
Conestoga Wireless Company***

Dear Ms. Salas:

On behalf of Conestoga Wireless Company ("Conestoga"), we hereby submit Conestoga's fourth quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

Please contact the undersigned counsel if you have any questions.

Very truly yours,



John A. Prendergast
D. Cary Mitchell
Counsel to Conestoga Wireless Company

Att.



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December 28, 2001

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Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: CC Docket No. 94-102
Fourth Quarterly TTY Implementation Report
Conestoga Wireless Company

Dear Ms. Salas:

Conestoga Wireless Company ("Conestoga") hereby submits its fourth quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000. Conestoga is licensed to provide broadband PCS services in the following BTA markets:

Market	Block	Sub	Call Sign	Market Name
BTA360	C		WPOJ725	Pottsville, PA
BTA370	C	2	WPOJ726	Reading, PA
BTA429	C		WPOJ727	State College, PA
BTA437	C		WPOJ728	Sunbury-Shamokin, PA
BTA475	C		WPOJ729	Williamsport, PA
BTA360	D		KNLF905	Pottsville, PA
BTA370	D		KNLG701	Reading, PA
BTA437	D		KNLG945	Sunbury-Shamokin, PA
BTA475	D		KNLG703	Williamsport, PA

Conestoga's digital wireless network is currently using GSM infrastructure equipment from Nortel. As a result, Conestoga is dependent on Nortel for the implementation of a digital TTY solution. Once the Nortel TTY solution becomes commercially available, Conestoga will implement the solution throughout its network.¹

Due to the unavailability of Nortel's digital TTY solution, Conestoga notes that, despite its best efforts, it will not be able to meet the December 31, 2001 deadline by which carriers operating digital systems must have obtained all software upgrades and

¹ Conestoga notes that on December 4, 2001, its parent company, Conestoga Enterprises, Inc. ("CEI") entered into a definitive merger agreement with D&E Communications, Inc. Detailed information about D&E is available online at www.decommunications.com. An FCC Form 603 application seeking Commission's approval for the transfer of control of Conestoga Wireless to D&E was filed on December 26, 2001 (see FCC File No. 0000709872). CEI has withdrawn its previously filed FCC Form 603 application for the transfer of control of CEI's subsidiary companies to NTELOS, Inc. (see FCC File No. 0000586729).

equipment necessary to make their systems capable of transmitting 911 calls from TTY devices.² To the extent necessary, Conestoga requests that the Commission consider its TTY implementation report as a request for waiver of the December 31, 2001 requirement. It should be emphasized that the waiver is being requested out of an abundance of caution; and that, in any event, a waiver does not appear to be necessary because there is no mention of the December 31, 2001 deadline in Section 20.18(c) of the Commission's Rules.

It is Conestoga's understanding that Nortel will be filing an updated TTY capability status report through the TTY Forum. Conestoga therefore directs the Commission to Nortel's report for specific information regarding the company's TTY development and deployment activities. Conestoga assures the Commission that it will make every effort to implement TTY capability in its markets by the June 30, 2002 deadline.

Respectfully Submitted,

CONESTOGA WIRELESS COMPANY

A handwritten signature in black ink, appearing to read "W.D. Chamblin, III", followed by a small circular flourish.

William D. Chamblin, III
President

² In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket 94-102, 15 FCC Rcd 25216 (December 28, 2000), (*"Fourth Report and Order"*).